


**FILED**

MAR 31 2016

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY  DEPUTY CLERK

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United States of America

**SEALED**

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RICKY LEE RICHARDSON JR.,  
  
Defendant.

CASE NO. **2:16 - CR - 0069 TLN**

VIOLATIONS: 18 U.S.C. § 1591(a)(1) – Sex  
Trafficking of a Child; 18 U.S.C. § 2252(a)(4)(B) –  
Possession of Child Pornography; 18 U.S.C. §§  
1594(d) and 2253(a) – Criminal Forfeiture

INDICTMENT

COUNT ONE: [18 U.S.C. § 1591(a)(1) – Sex Trafficking of a Child]

The Grand Jury charges: T H A T

RICKY LEE RICHARDSON JR.,  
defendant herein, between on or about November 27, 2011, and continuing through on or about March  
7, 2012, in the State and Eastern District of California, in and affecting interstate commerce, knowing  
and in reckless disregard of the fact that Victim 1, a person known to the Grand Jury, had not attained  
the age of 18 years, and after having reasonable opportunity to observe Victim 1, did knowingly recruit,  
entice, harbor, transport, provide, obtain, advertise, and maintain by any means Victim 1, knowing that  
Victim 1 would be caused to engage in at least one commercial sex act, in violation of Title 18, United  
States Code, Section 1591(a)(1).

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1 COUNT TWO: [18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography]

2 The Grand Jury further charges: T H A T

3 RICKY LEE RICHARDSON JR.,

4 defendant herein, on or about March 7, 2012, in the County of San Joaquin, State and Eastern District of  
5 California, did knowingly possess one or more matters, which contained visual depictions of Victim 1,  
6 including, but not limited to “securedownload-2.jpeg”; “securedownload-6.jpeg”; and “securedownload-  
7 7.jpeg” that had been mailed, shipped and transported in interstate and foreign commerce, and which  
8 were produced using materials which had been mailed, shipped, and transported in interstate and foreign  
9 commerce, by any means including by computer, the production of which involved the use of a minor  
10 engaging in sexually explicit conduct, and which visual depictions were of such conduct, in violation of  
11 Title 18, United States Code, Section 2252(a)(4)(B).

12 FORFEITURE ALLEGATION: [18 U.S.C. §§ 1594(d) and 2253(a) – Criminal Forfeiture]

13 1. Upon conviction of the offense alleged in Count One of this Indictment, defendant  
14 RICKY LEE RICHARDSON JR. shall forfeit to the United States pursuant to 18 U.S.C. § 1594(d), any  
15 property, real or personal, that was used or intended to be used to commit or to facilitate the commission  
16 of such violation, and any property, real or personal, constituting or derived from, any proceeds that  
17 such person obtained, directly or indirectly, as a result of such violation, including but not limited to:

- 18 a. Apple MacBook Pro laptop computer, serial number W0097HW6EE; and  
19 b. HTC Sprint PC 36100 mobile phone, serial number HT12MHL13728.

20 2. Upon conviction of the offense alleged in Count Two of this Indictment, defendant  
21 RICKY LEE RICHARDSON JR. shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a), any  
22 and all matter which contains visual depictions produced, transported, mailed, shipped or received in  
23 violation thereof; any property, real or personal, constituting or traceable to gross profits or other  
24 proceeds the defendant obtained as a result of said violation; and any property, real or personal, used or  
25 intended to be used to commit and to promote the commission of such violation, or any property  
26 traceable to such property, including but not limited to:

- 27 a. Apple MacBook Pro laptop computer, serial number W0097HW6EE; and  
28 b. HTC Sprint PC 36100 mobile phone, serial number HT12MHL13728.

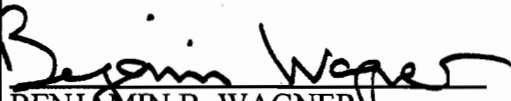
3. If any property subject to forfeiture as a result of the offense alleged in this Indictment, for which defendant is convicted:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c) and 18 U.S.C. § 2253(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant, up to the value of the property subject to forfeiture.

A TRUE BILL.

**/s/ Signature on file w/AUSA**  
**FOREPERSON**

  
BENJAMIN B. WAGNER  
United States Attorney

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

**THE UNITED STATES OF AMERICA**

vs.

**RICKEY LEE RICHARDSON JR.**

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**INDICTMENT**

**VIOLATION(S):** 18 U.S.C. § 1591(a)(1) – Sex Trafficking of a Child;  
18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography;  
18 U.S.C. §§ 1594(d) and 2253(a) – Criminal Forfeiture

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*A true bill,*

**/s/ Signature on file w/AUSA**

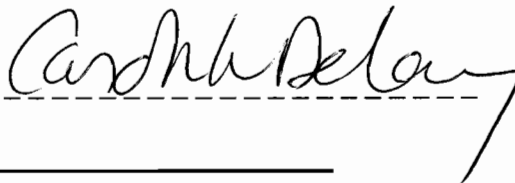
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*Foreman.*

*Filed in open court this* \_\_\_\_\_ *day*

*of* \_\_\_\_\_ *, A.D. 20* \_\_\_\_\_

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*Clerk.*

**NO BAIL WARRANT PENDING HEARING**

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**2:16 - CR - 0069 TLN**

**United States v. Ricky Lee Richardson Jr.**  
**Penalties for Indictment**

**Defendant**

**Ricky Lee Richardson Jr.**

**COUNT 1:**            **ALL DEFENDANTS**

**VIOLATION:**        18 U.S.C. § 1591(a)(1) – Sex Trafficking of a Child

**PENALTIES:**        Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or  
Fine of up to \$250,000; or both fine and imprisonment  
Supervised release of at least 5 years up to life

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)

**COUNT 2:**            **ALL DEFENDANTS**

**VIOLATION:**        18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography

**PENALTIES:**        Maximum of up to 10 years in prison; or  
Fine of up to \$250,000; or both fine and imprisonment  
Supervised release of at least 5 years up to life

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)

**FORFEITURE ALLEGATION:**    **all Defendants**

**VIOLATION:**        18 U.S.C. §§ 1594(d) and 2253(a) – Criminal Forfeiture

**PENALTIES:**        As stated in the indictment